

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

DAVID CHERRY, Personal Representative)
of the ESTATE OF PAMELA CHERRY,)
DECEASED,)

Plaintiff,)

vs.)

MACON HOSPITAL, INC. d/b/a MACON)
COUNTY GENERAL HOSPITAL and)
HANNA C. ILIA, M.D.,)

Defendants.)

CASE NO. 2:12-cv-00043

PLAINTIFF'S EXPERT DISCLOSURE

Comes now the Plaintiff, by counsel, and respectfully submits his list of expert witnesses whom he may call upon to testify at the trial of this matter.

The following witnesses have been retained or specially employed to provide expert testimony and attached hereto are copies of their reports, C.V.s, prior testimony listings, publications, and fee schedules:

1. Richard M. Sobel, M.D., M.P.H.
101 Passage Point
Peachtree City, GA 30269

Dr. Sobel is an emergency physician licensed and practicing in the contiguous State of Georgia. Dr. Sobel is familiar with the applicable standard of care for emergency room care and services, including those services provided in communities and institutions comparable to Macon County General Hospital. Dr. Sobel will testify as to Dr. Ilia's deviations from the standards of reasonable skill and care in diagnosing or ruling out a cardiac cause for Pamela Cherry's chest, back, and jaw pain which were directly attributable to her eventual cardiac related death. Dr. Sobel will additionally testify as to the deviations of care of Macon County General Hospital, and its agents and employees, including following their own protocols, all of which led directly to Pamela Cherry's death.

EXHIBIT

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The exhibits that may be used to summarize or support Dr. Sobel's opinions would include reference to medical records and documents produced by Defendants, including Macon County General Hospital's chest pain template and the fail safe checklist. Dr. Sobel may have a bullet point summary of the deviations from the standard of reasonable care. Dr. Sobel may present an enlargement or sectioning of the medical chart, including the EKG demonstrating its abnormalities.

2. Ronald J. Krone, M.D.
6906 Waterman
St. Louis, MO 63130

Dr. Krone is a professor and practicing cardiologist in the contiguous State of Missouri. Dr. Krone will testify as to the proper interpretation of electrocardiograms, including Pamela Cherry's electrocardiogram at Macon County General Hospital on May 30, 2011. Dr. Krone will testify as to the available cardiac interventions which were available to have benefited Pamela Cherry as well as the likely physiologic explanations leading to her preventable cardiac related death. Dr. Krone will testify as to the preventative effects of aspirin, Heparin, and platelet inhibitors such as Plavix or Integrilin in preventing cardiac artery occlusions. Dr. Krone will offer his opinion to a reasonable degree of medical certainty that Pamela Cherry's premature death was directly and causally related to her not being benefited from appropriate, available, and indicated interventions. The non-specifically retained medical personnel providing care to Pamela Cherry, including Dr. Joseph Fredi, will be able to provide testimony as to the available services and interventions available for patients received on transfers at Vanderbilt from institutions such as Macon County General Hospital.

The exhibits that may be used to summarize or support Dr. Krone's opinions include the medical records and exhibits as referenced by his report and that of Dr. Sobel. Dr. Krone may utilize a bullet point summary of lifesaving available interventions. Dr. Krone may additionally utilize a graphing showing the time relationship for elevation of cardiac markers and enzymes. Dr. Krone may present an enlargement or sectioning of the medical chart, including the EKG demonstrating its abnormalities.

3. Gilbert L. Mathis, Ph.D.
307 Business Building
Murray, KY 42071-3314

Dr. Mathis is a professor of economics with expertise in economic assessments. Dr. Mathis calculated and quantified the economic losses of the Estate of Pamela Cherry, including the earning capacity of Pamela Cherry.

Dr. Mathis will have a table summarizing the economic losses consistent with his report.

The following witnesses have not been retained nor specially employed to testify as expert witnesses, but by virtue of their training, education, experience, their official capacities, and involvement in this matter in their professional capacities, have findings, observations, measurements, and/or opinions to render. Treating medical professionals are expected to testify as to their diagnosis as well as the cause of the conditions confronting Pamela Cherry and their relationship to the care rendered to Pamela Cherry on May 30, 2011. They will additionally comment on the reasonableness and necessity of the medical expenses incurred by Pamela Cherry prior to her passing.

4. Joseph L. Fredi, M.D.
Vanderbilt Heart & Vascular Institute
1215 21st Ave. S.
Nashville, TN 37232

Plaintiff reserves the right to designate other expert witnesses as provided for in the Federal Rules of Civil Procedure to respond to and to rebut the experts designated by any other party, if any are so designated.

Plaintiff reserves the right to call any other duly qualified expert to provide the Court the benefit of their testimony and analysis of any care, work, or efforts they provided to the parties, or to any other person or entity who was investigating, researching, or interested in this matter.

Plaintiff reserves the right to call any and all fact or expert witnesses designated by any party in this case.

Plaintiff reserves the right to read the deposition of any and all of the witnesses who have testified, or are called at the time of trial to testify, and all of said witnesses who have previously

testified by way of deposition, and to elicit from said witnesses any and all expert testimony for which they may be competent to give.

Plaintiff also reserves the right to withdraw any of the expert witnesses listed at any time.

Respectfully submitted,

WILSON KEHOE WININGHAM LLC



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first class United States mail this 15th day of April, 2013 upon Reba Brown and Winston N. Harless, LEWIS, KING, KRIEG & WALDROP, P.C., 424 Church St., Ste. 2500, P. O. Box 198615, Nashville, TN 37219 and Phillip North and Michael F. Jameson, NORTH, PURSELL, RAMOS & JAMESON, PLC, 414 Union St., Ste. 1850, Nashville, TN 37219-1783.

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